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DATE FILED: 4/15/2021

April 14, 2021

Via ECF

Hon. Analisa Torres
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 15D
New York, NY 10007-1312

Re: Giroto vs. Naadam Inc. d/b/a Naadam-West Village, et ano.
Case No. 1:21-cv-226 (AT)(BCM)

Dear Judge Torres:

We have this day filed our notices of appearance on behalf of Defendant Naadam Inc. (“Naadam”) in this matter and have spoken with counsel for plaintiff about expedited efforts to resolve this matter in a manner which satisfactory to plaintiff. In this regard, we have also made clear to plaintiff’s counsel that concluding a settlement will be made more efficient were Naadam’s co-defendant (and its landlord at the subject premises) involved in the process. We intend promptly to confer with counsel for Defendant CR32 Properties LLC (“CR32”) for this purpose albeit we understand that such Defendant has apparently yet to appear in this matter.

We shall this day, as required, agree to a case management plan without the input of CR32. In light of all of the foregoing, we respectfully request that the initial pretrial conference in this matter be adjourned from April 21, 2021, to May 5, 2021, and to enlarge Defendant Naadam’s time to answer the complaint in this matter to and including, April 28, 2021, as we are confident that these extensions will facilitate a full and final settlement of this matter, both with regard to remediation and other elements of settlement.

Both of the foregoing requests are made with the consent of counsel for Plaintiff.

This the first request for enlargement of Defendant’s time to respond to the Complaint in this matter. This the second request for adjournment of the initial pretrial conference, but the first request made by Defendant Naadam. Again, it is our respectful position that the grant of

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these requests will facilitate the speedy and full resolution of this matter. We thank the Court for its consideration of these requests.

Respectfully,

A handwritten signature in blue ink, appearing to read 'JPE', with a large, loopy flourish extending to the right.

JEFFREY P. ENGLANDER

JPE/tm

Cc: Bradley Weitz, Esq.

GRANTED. The initial pretrial conference scheduled for April 21, 2021, is ADJOURNED to **May 5, 2021**, at **11:20 a.m.** because Defendant CR32 has yet to appear. By **April 28, 2021**, the parties shall submit an updated joint letter and proposed case management plan. By **April 28, 2021**, Defendant Nadaam shall answer or otherwise respond to the complaint.

SO ORDERED.

Dated: April 15, 2021
New York, New York

A handwritten signature in black ink, appearing to read 'AT', with a large, loopy flourish extending to the right.

ANALISA TORRES
United States District Judge